

14 September 2023

To the Commerce Commission infrastructure regulation team,  
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## Introduction

1. Thank-you for the opportunity to make this submission. We welcome the opportunity to comment on the *Targeted Information Disclosure Review (2024) – Electricity Distribution Businesses, Draft decision review*.
2. We also wish to note our support of the Electricity Networks Aotearoa (ENA) submission.
3. Northpower is supportive of the intent of many of the proposals. However, our primary concerns are twofold:
  - a. Greater clarity in the definition of the requirements, to ensure consistency of approach across EDBs. Our submission focusses on suggestions for clarification and amendment to the draft decision, to enable better quality and consistency of information.
  - b. The timing and cost of introducing some of these new systems and processes, as the final decision is not due until Q1 2024. This is likely to cause material issues with data recording and collation and it is important that EDBs have time to prepare their systems and processes.

## Amendment D3—Network Constraints

4. In principle we support the additional information required on zone substations in Schedule 12b(i) around network constraints, however, the time horizon for the reporting should align with the 10-year time horizon for EDBs AMPs. Further, forecasting constraints 20 years out will be inherently uncertain and almost certain to be inaccurate, therefore the value of this information to interested parties will be very limited.
5. We have no issues with the rest of the amendments under Amendment D3 in relation to additional information required in Schedule 9e(iii), geospatial data for zone substation, and the additional descriptive AMP reporting requirements.

## Amendment AM6 – Vegetation management reporting

6. In relation to the proposed disaggregated opex categories in Schedule 6b, we are concerned around the timing for this change. If a decision is published in late Q1 2024, it will not give EDBs sufficient time to update processes and systems to ensure this information sufficiently captured to meet ID reporting requirements and audit standards. We acknowledge that data capturing should start as soon as possible and suggest that DY25 is exempt from assurance requirement.
7. Under proposed Schedule 6b, in relation to the “assessment and notification costs” of “vegetation management opex” we suggest that it is further separated out to

“assessment costs” and “landowner liaison and negotiation costs”, as these are two very different activities, the former which the EDB has control over, the latter it does not.

8. Under proposed Schedule 9c, we disagree with the definition of “overhead circuit sites” because it is uncertain and could be applied differently. For example, how is a site defined? How long is the site? Is it just the few meters adjacent to the fall zone tree or the spans on either side? There would be little consistency between EDBs and it would be potentially impossible to compare among EDBs. This definition requires further refinement and should be based on the circuit length under active vegetation management and inspection.
9. Under proposed Schedule 10, in relation to the further breakdown reporting of Class C interruptions caused by vegetation, we support the intent of further break down of vegetation causes, however, the current categories can overlap, and one event could potentially be reported in multiple categories. It is not clear how this will provide better insights. For example, an event caused by an “out-of-zone” tree, by “wind-borne debris”, and “related to inclement weather” could legitimately be reported in all three categories. A more appropriate approach could be to classify all vegetation faults into inclement weather related (including wind-borne debris) or non-weather related. Then this could be further broken down into sub-categories of in-zone or out-of-zone.

#### **Amendment Q14 – expand ID requirements to include raw interruption data and information on worst-performing feeders**

10. In relation to the proposed raw interruption data required under Schedule 10a, we believe there appears to be a duplication of information required because “circuit location’ based on its definition in the determination effectively will provide the same information as required under “feeders affected by interruption”.
11. In relation to the additional information required on the worst-performing feeders, we agree with ENA’s view that the reporting should be limited to those feeders in the 90th percentile of **unplanned** SAIDI and or SAIFI.
12. We support the removing of the existing requirement for disclosure of normalised SAIFI and SAIDI from Schedule 10(i).

#### **Conclusion**

13. Thank you for the opportunity to make a submission on the draft decision Targeted Information Disclosure Review (2024)– Electricity Distribution Businesses.
14. If you have further queries regarding this submission do not hesitate to contact me on 